

MB

OFFICE OF THE CHAIRMAN  
CORRESPONDENCE ASSIGNMENT

OC 06-085

ASSIGNED TO: LEGAL

DATE: 03/28/2006

CORRESPONDENT: JAMES A. CLIFTON  
PRESIDENT  
WASHINGTON ECONOMICS CONSULTING  
GROUP, INC.  
P.O. BOX 60654  
POTOMAC, MARYLAND 20859

MR. CLIFTON WRITES REGARDING WAL-MART'S APPLICATION FOR AN ILC  
CHARTER.

THE ATTACHED CORRESPONDENCE HAS BEEN ASSIGNED TO LEGAL FOR  
INFORMATION.

IF YOU HAVE ANY QUESTIONS RELATING TO THIS ASSIGNMENT, PLEASE  
CONTACT THE CORRESPONDENCE UNIT OF THE OFFICE OF LEGISLATIVE  
AFFAIRS AT 898-7055.

DISTRIBUTION:

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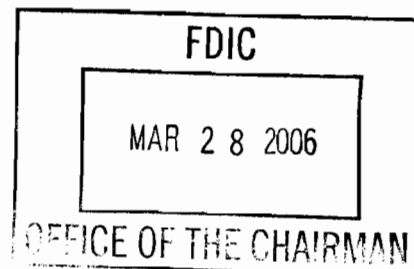
JAMES A. CLIFTON  
PRESIDENT  
CLIFTON@WECG.COM

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## VIA FACSIMILE AND U.S. MAIL

March 28, 2006

Mr. Martin Gruenberg  
Vice Chairman  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, DC 20429



## Re: In the matter of Wal-Mart Bank Application for Deposit Insurance

Dear Mr. Gruenberg:

In light of the large number of comments on this application, we desire to state for the record as follows. We applaud Wal-Mart's decision in this application process to comply with federal rules that require lenders to serve low- and moderate- income clients by not seeking an exemption from the 1977 Community Reinvestment Act.

According to our ongoing studies, Wal-Mart, Incorporated is in the unique position of being able to serve public policy interests of this country by retailing certain affordable housing products. In connection with the possible sale of affordable housing, Wal-Mart Bank would serve the public policy interests of this country by also becoming a conforming mortgage lender for these affordable housing products. On considerable information and belief, no large existing conforming mortgage lender doing business with Fannie Mae or Freddie Mac has been materially interested in, or will become materially interested in, making conforming mortgage loans on these affordable housing products.

We do not know of Wal-Mart's position on this matter. We simply state for the record that if Wal-Mart is interested in such a retail and lending platform for affordable housing, then: (1) this is in the general public interest; and (2) virtually all of the comments made to date opposing Wal-Mart's application for deposit insurance are irrelevant or invalid.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Clifton".

James A. Clifton  
President